

Dear FCC officers:

In light of recent events, I feel compelled to again comment with new emphasis regarding Docket 03-104, covering expanded BPL service.

To preface my comments, I am an electrical engineer, and part of my graduate school curriculum was electrical power generation and distribution.

With the recent blackout in the eastern parts of the US and Canada, it has become obvious that the electric power utilities are in dire need of modernization. This has been noted at many points in the past, but this past week, it became obvious that the condition of the North American power grid is far worse than believed.

Still, these same power companies wish to provide high-speed internet access to their customers while their ability to reliably provide electrical power is apparently quite suspect.

At the same time as the blackout was demonstrating the problems with the power grid, and cellular phone systems were becoming useless due to overuse, one of the groups that would be MOST harmed by BPL's use - amateur radio operators - were donating their time, skill, and personally-purchased equipment to provide much-needed communications support to emergency services (fire, police), service agencies (Red Cross), and the general public.

...as ham radio operators have unselfishly done countless times in the past...

Yet at this time, it is these same ham radio operators who have provided public service free of cost whose allocated frequencies are literally "under attack" by the spectre of BPL.

BPL will splatter RF noise from approximately 2-80 MHz over much of the country, rendering these frequencies nearly useless for amateur or nearly any other service...and there are a LOT of users, including commercial aviation, hams, the military, radio astronomers, the Dept. of Commerce, the Coast Guard, and many others.

Many of these users are from licensed services, such as amateur radio. Remember that if hams are subject to interference, it is the responsibility of the SOURCE of interference to cease this interference.

The only way to eliminate BPL interference is to shut it off completely.

Further, any system that radiates, due to the law of reciprocity, is also capable of receiving energy. All of those legally present transmitted signals would serve to interfere with BPL systems and users, and it would be the responsibility of the power companies to resolve these complaints by performing modifications on their own system.

Additionally, let it be known that, historically speaking, many power companies have very poor track records with ceasing the interference caused to ham operators simply through their ELECTRIC DISTRIBUTION equipment. Adding BPL to their plates would only complicate matters.

In a world of fiber-optic cable, satellites, and cable modems, BPL is neither a good idea nor necessary.

BPL's mere use would cause millions of licensed users of the HF spectrum to effectively go silent, and would pollute the HF spectrum in ways that could only be considered irresponsible at best, criminal at worst.

Finally, imagine a country with no volunteer ham operators. In today's world, hams are a valuable line of defense in ensuring national security. Hams provide communications support, free of charge, in times of natural and other disasters (witness the hundreds of thousands of volunteer ham hours given in the support of 9/11 in NYC and DC).

Where is the protection for licensed operators who are supposed to be protected from interference sources?

It's supposed to come from the FCC!

If you are curious just how deleterious the effects of BPL will be, please visit:

<http://www.arrl.org/news/stories/2003/08/08/2/?nc=1>

and proceed down the page to hear the noise.

Now imagine trying to communicate through it.

It is time to tell the power companies this is NOT a good idea, simply because it is NOT a good idea unless it can coexist with other systems... which it simply cannot!

It's time to tell the POWER companies to work on providing reliable POWER, NOT to offer us a redundant, "open" broadband system (unlike cable, which is a "closed" system) that's hostile to pre-existing and licensed users.

If the FCC is truly interested in assisting with national security, amateur radio operators must continue to have clear access to the frequencies allocated. BPL poses a severe and unacceptable impediment to this access.

It's time to protect the millions users who legally use these

frequencies.

Please vote to reject the implementation of BPL.

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